

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**BUREAU OF LAND MANAGEMENT**  
Office of Fire and Aviation  
3833 South Development Avenue  
Boise, Idaho 83705

August 7, 2000

In Reply Refer To:  
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EMS Transmission 08/08/2000  
Information Bulletin No. OF&A 2000-044

To: SD's

From: Director, Office of Fire and Aviation

Subject: Long Term Retardant Sampling of 1999 and 2000 Drop Areas

DD: 12/1/00

The Bureau has initiated a contract to take test samples from retardant drop sites in Alaska, California, Colorado, New Mexico, Nevada, and Oregon. This measure was taken in response to a March 2000 USGS report identifying the possibility that a corrosion inhibitor used in some long term retardant products may produce undesirable residues.

This sampling contract is imperative for future utilization of long term retardant and the 2001 procurement of retardant products. An agreement between the firefighting agencies, the U.S. Fish & Wildlife Service, and National Marine Fisheries states that on -the-ground studies addressing retardant applications will be performed during calendar year 2000. A copy of this agreement is attached.

The objectives of the retardant sampling contract is to determine the mean levels of this specific ingredient still present at various 1999 and 2000 drop sites. The sampling of these sites will be conducted during August and September of this year. In order to successfully complete this study, assistance from national, state, and field offices will be needed to identify retardant drop locations and to ensure correct and scientifically acceptable sampling. The actual number of fire retardant drop sites to be sampled in each state will vary.

The target date for completion of this contract is December 1, 2000. Field sampling teams of three persons each will need points of contact in the state and field offices. Local fire, resource, or aviation personnel should plan to accompany them to the test sites during sample collection. The duration of the work is expected to be about two weeks in each state. Most areas to be sampled should be accessible by ground transportation, though preparations should be made for helicopter transport to some sites.

The attachment for the state and field offices contains drop site information essential to the contractor. Information will also be needed from airtanker bases and Geographic Area Coordination Centers. Drop sites will be randomly selected from the information provided to the contractor. This information is needed as soon as possible and will be compiled and coordinated with Mr. Ken Smith at the National Applied Resource Sciences Center in Denver, Colorado. Mr. Smith can be reached at 303-236-0206. The task manager for this contract is Mr. Corey Grant, Natural Resource specialist, BLM Fire Management, NIFC. Mr. Grant can be reached at 208-387-5433.

Signed by:  
Lynn P. Findley  
Acting Director, Office of Fire and Aviation

Authenticated by:  
Pat Lewis  
Supervisory Mgmt. Asst.

2 Attachments:

- 1 - USFWS letter (2 pgs.)
- 2 - Retardant Drop Site Information (1 pg.)

Distribution

Fire Program Manager  
Aviation Program Manager  
NIFC Director  
Jay Thietten, MIB Room 5627  
Cyndie Hogg, NARTC

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**FISH AND WILDLIFE SERVICE**  
Washington, D.C. 20240

In Reply Refer To:  
FWS/TE

April 23,2000

Mr. Larry Hamilton  
Director  
Office of Fire and Aviation  
National Interagency Fire Center- BLM  
3833 S. Development Avenue  
Boise, Idaho 83705-5354

Dear Mr. Hamilton:

The Fish and Wildlife Service is in receipt of your April 19, 2000, letter transmitting a set of proposed guidelines for use of fire-suppressing chemical retardants and foams. Your letter specifically asked the Service to agree that these guidelines are appropriate interim measures for the protection of aquatic species that are listed as threatened or endangered species under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) when chemical retardants and foams are aerially applied on lands subject to federal wildfire suppression activity.

Between April 14 and April 19, 2000, the Service worked closely with representatives of the firefighting agencies (U.S. Forest Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, and the Fish and Wildlife Service) in developing the subject guidelines as part of the emergency consultation procedures described at 50 CFR 402.05. The Service concurs that these guidelines describe appropriate measures to minimize adverse effects to listed aquatic species under the jurisdiction of the Service when the firefighting agencies are conducting emergency response activities related to wildland firefighting.

Completion of the emergency consultation procedures generally requires action agencies to initiate consultation with the Service as soon as practicable after the emergency is under control. In this situation, the emergency action was the need to develop appropriate guidelines such that aerial application of retardants or foam could be resumed in a timely manner for use during the 2000 fire season, which is now upon us. In keeping with the need to initiate consultation after the emergency is under control, the Service must emphasize the need to conduct a programmatic review of the environmental effects of using chemical foams and retardants in wildland firefighting, including a section 7 consultation, as soon as practicable.

Attachment 1-1

Mr. Larry Hamilton

As a point of clarification, the definition of the term waterway could be viewed as excluding some aquatic habitats such as springs, seeps, or intermittent streams. The Service would like to affirm that the basic guideline of avoiding application of retardants or foam within 300 feet of a water-way should also apply to such habitats. To the extent that retardants or foam are applied to such habitats, the provisions found in paragraph I.b. of the threatened and endangered species subsection of the subject guidelines will apply.

The Service would also like to clarify that these guidelines will remain in effect until December 31, 2000, with possible extension through 2001, based on the caveat that the firefighting agencies will conduct on-the-ground studies during calendar year 2000 aimed at providing: 1) additional information on the efficacy of the guidelines; and 2) assessments of the effects to aquatic species resulting from use of retardants and foams during calendar years 1999 and 2000. Furthermore, the firefighting agencies will conduct additional consultation with the Service and will revisit these interim guidelines in January, 2001, based on any data from the monitoring and research studies mentioned above.

The Service looks forward to continued cooperation with you on this important issue. Please recognize, however, that the studies referenced above and your commitment to condition new or extended contracts upon the results of future consultations are fundamental to the Service's continued support of this interim approach. Please contact Dr. Richard Sayers, Division of Endangered Species (703/358-2106) if you have any further questions about this issue.

Sincerely,

/s/ Nancy G. Gloman  
Acting, Director for  
Ecological Services

Attachment 1-2

## RETARDANT DROP SITE INFORMATION

The contractor for this long term retardant sampling contract is Dyanamac Corp. Inc.

**For assurance of statistically sound sampling techniques the contractor needs to receive a list of fires that received long term retardant in 1999 and 2000. Compilation of the list of fires should be accomplished in an expeditious and practical manner. In addition to the list of fires the following information is also needed for each fire-Fire Location (latitude and longitude), elevation of fire or drop site, amount of retardant applied to fire, and the fire areas mean annual precipitation.** This information should be sent to Mr. Ken Smith as soon as possible.

It will be necessary for State and Field Offices to coordinate with airtanker bases addressing the amounts of retardant delivered to each fire. The fires listed for 2000 should include fires that occurred prior to August 1, 2000. If States have one fire that they desire to be included in the test sampling, that fire must be identified to the contractor as required.

Identification of retardant drop sites will require assistance by field personnel familiar retardant dropping in support of fire suppression or persons who actually observed or directed retardant drops on the fires being sampled. Areas that received retardant in 1999 may be difficult to locate, a red or blue/black color on the vegetation or soil is an indicator of a previous retardant drop.

Send the requested information to:

Attn: Ken Smith RS - 1 3 0  
NARSC  
Denver Federal Bldg.  
P.O. Box 50  
Denver, CO 80225-0047

Federal Express Mailing address:

Attn: Ken Smith RS- 1 30  
NARSC  
Denver Federal Bldg.  
5th street  
Denver, CO 80225-0047